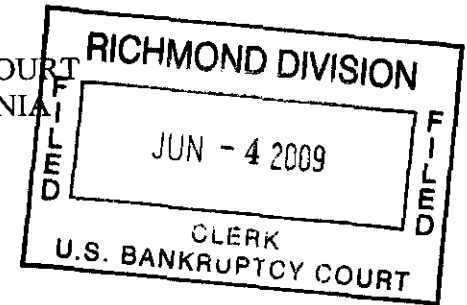


IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION



----- :  
In re: : Chapter 11  
: :  
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)  
et al., :  
: :  
Debtors. : Jointly Administered  
----- :

**RESPONSE TO DEBTORS' SIXTH OMNIBUS OBJECTION TO CERTAIN  
MISCLASSIFIED NON-GOODS 503 (B) (9) CLAIMS**

Winn Bus Lines, Inc., which is a party to this action and hereby files this Response to Debtors' Sixth Omnibus Objection pursuant to Section 503 (B) (9) and state:

1. Winn's claim arises from the physical placement of charter equipment by Winn to Circuit City which Circuit City then used to transport between October 13, 2008 and October 31, 2008.
2. This Objection challenges the fact that the physical placement of this equipment was a "good" and attempts to bend the interpretation and definition of a "good" as it is defined economically.
3. A good is any object or service that increases utility to the consumer, directly or indirectly. Additionally a good increases this measure of relative satisfaction from the consumer, for which the quantity demanded exceeds the quantity supplied at zero price. It is for this reason that we feel that the debtor must first show that these goods are not objects that increased utility for the debtor, directly or indirectly before making the objection that the claim is miscategorized.
4. The objection seeks to apply a hindsight view of what Winn provided. At the time it provided equipment, the arrangement was no different than had Winn sold equipment to Circuit City. Winn seeks compensation for the equipment it provided, not any service.

5. Winn Bus Lines, Inc. is located at 1831 Westwood Avenue, Richmond Virginia 23227 and can be telephoned at (804) 358-9466 or reached by facsimile at (804) 353-2606.

Respectfully Submitted:  
WINN BUS LINES, INC.

**DECLARATION**

**Commonwealth of Virginia**  
**City of Richmond**

I, Robert Mark Pounders, Director of Operations at Winn Bus Lines, Inc., do declare that I have personal knowledge of the relevant facts that support this response and have signed this declaration on this the 29<sup>th</sup> of May, 2009.

A handwritten signature in black ink, appearing to read 'R. Pounders', is written over a horizontal line.

*Robert Mark Pounders*  
*Director of Operations*  
*Winn Bus Lines, Inc.*